May 5, 2005

Jennifer J. Johnson
Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington DC 20551
RE: Docket No. R-1225

Robert E. Feldman
Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th St. NW 20429
RE: RIN 3064-AC89

Office of the Comptroller of the Currency
250 E St. SW, Mail Stop 1-5
Washington 20219
RE: Docket Number 05-04

To Whom It May Concern:

I urge you to enhance your proposed changes to the Community Reinvestment Act (CRA) regulations so that banks do not reduce their levels of branches, and community development loans and investments to low- and moderate-income communities. Your proposal is an improvement from the one you issued in the fall, but serious issues remain.

The role of investments in communities cannot be belittled. Investments in affordable housing and economic development build wealth for families and communities and thus open up new markets for bank lending and services. As a Community Action Agency serving both urban and rural communities in Wisconsin, we are very aware of the value of the CRA requirements to ensure that low- and moderate-income citizens have access to capital for both housing and small business development.

Payday lending and other high cost credit has increased in my community the last several years. The last thing we need are CRA exams that no longer look at the number of bank branches in traditionally underserved communities. Please add the provision of bank branches as a clear factor on your proposed CRA exams for mid-size banks.

Equal Opportunity Employer

For the health of participants, volunteers, guests, and employees, Community Action Coalition for South Central WI, Inc. is a smoke, latex and fragrance free workplace. Please refrain from wearing colognes and scented lotions or hair products within the building.
I urge you to drop your proposed elimination of public data disclosure requirements regarding community development, and small business and small farm lending. Mid-size banks are vital in many communities, particularly in medium-sized cities and rural communities. The only way to hold them accountable for providing credit to small firms and for affordable housing and community development is if the CRA data remains publicly available. The public as well as regulatory agencies will have no way to systematically measure the responsiveness of these banks to critical credit needs if you eliminate this data.

Thank you for your consideration of my comments. If you have any questions, please feel free to contact me at 608-246-4730 Ext. 217.

Sincerely,

Gretta Hansen
Executive Director

cc. National Community Reinvestment Coalition